

GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP

ATTORNEYS AT LAW

ANDREW W. ALBSTEIN*
ARNOLD I. MAZEL
STEVEN R. UFFNER
HARVEY L. GOLDSTEIN
NEAL M. ROSENBLUM
KEVIN J. NASH
IRIS A. ALBSTEIN
BARRY E. ZWEIGBAUM
DOUGLAS TAUS
ROBERT W. LO SCHIAVO*
ELIZABETH SMITH*[†]
MATTHEW E. HEARLE
AUBREY E. RICCARDI*
STEPHEN BORDANARO
ANTHONY J. SCHLUR
DANIEL J. SLATZ

J. TED DONOVAN
DORAN I. GOLUBTCHIK
MICHELLE MCLEOD*
ARTHUR A. HIRSCHLER
GERALD BUKARY
ELI RAIDER
SERGIO J. TUERO*
JAY SIMENS
STEWART WOLF*
CHRISTOPHER R. CLARKE
ERIC ZARATIN
PREET S. BAGGA
RAQUEL GOLDSTEIN
NEIL I. ALBSTEIN*
MICHAEL B. PODOLSKY*
JACQUELYN F. SCHWALB
EVAN LAZEROWITZ*
SARAH BENJI*

Kevin J. Nash, Esq.
Direct (212) 301-6944
Facsimile (212) 221-6532
KNash@GWFGLaw.com

22ND FLOOR
1501 BROADWAY
NEW YORK, N.Y. 10036
(212) 221-5700
TELECOPIER (212) 730-4518

BENJAMIN C. KIRSCHENBAUM
(OF COUNSEL)

EMANUEL GOLDBERG (1904-1988)
JACK WEPRIN (1930-1996)
BENJAMIN FINKEL (1905-1986)

* ALSO MEMBER OF NEW JERSEY BAR
* ALSO MEMBER OF TEXAS BAR
* ALSO MEMBER OF MASSACHUSETTS BAR
° ALSO ADMITTED IN CALIFORNIA
° MEMBER OF FLORIDA & DC & NY

February 2, 2021

Via ECF and Email

Hon. James L. Garrity
US Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

Re: Genever Holdings LLC
Case No. 20-12411-JLG
Status Letter

Dear Judge Garrity:

I apologize for not being in a position to get an updated status letter to Your Honor earlier today. After the last hearing, Mr. Spelfogel, Mr. Lawall and I have been working on putting together a proposed settlement agreement based upon the term sheet that was circulated last week. The proposed settlement agreement (which has not yet been finalized and circulated to Mr. Morrissey and Mr. Sasson) has been drafted, revised and redrafted. There are still discussion regarding the final language on certain provisions, and another version is scheduled to be circulated tonight. Hopefully the final language can be agreed upon shortly, whereupon we will then circulate the proposed document to Mr. Morrissey and Mr. Sasson for their comments.

I think we are close, and advanced the process beyond the term sheet to preparation of a proposed settlement agreement that is almost finished. I have requested that the conference be placed at the end of Your Honor's calendar tomorrow so Mr. Spelfogel, Mr. Lawall and I may have some time to work on the language tonight and tomorrow morning.

Respectfully yours,

/s/ Kevin J. Nash, Esq.

cc: Francis Lawall, Esq. (via ECF and Email)
Douglas Spelfogel, Esq. (via ECF and Email)
Richard Morrissey, Esq. (via ECF and Email)
Gabriel Sasson, Esq. (via ECF and Email)